

EDWARDS HENDERSON LEHRMAN

Florida Office

Bradley J. Edwards *[†][‡]
Seth M. Lehrman *[†]
Catherine L. Davis *
Dean M. Kaire *

425 North Andrews Avenue
Suite 2
Fort Lauderdale, FL 33301

Telephone (954)524-2820
Fax (954)524-2822
info@epllc.com

New York Office

Brittany N. Henderson *[†][‡]

[†] Admitted in California
[‡] Admitted in District of Columbia
* Admitted in Florida
[‡] Admitted in New York
[†] Board Certified Civil Trial Lawyer

June 12, 2013

VIA ELECTRONIC FILING

The Honorable Jed S. Rakoff
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1340
New York, New York 10007

**Re: *Jane Doe 1 v. Deutsche Bank Aktiengesellschaft, et al.* –
Jointly-Proposed Candidates for Claims Administrator
Case No.: Case No. 1:22-CV-10018 (JSR)**

Dear Judge Rakoff:

As requested by the Court at the June 1, 2023 preliminary settlement approval conference in the above-captioned action (the “Action”), Plaintiff Jane Doe 1 (“Plaintiff”) and Defendants Deutsche Bank Aktiengesellschaft, Deutsche Bank AG New York Branch, and Deutsche Bank Trust Company Americas (collectively, “Deutsche Bank”) write jointly to propose for the Court’s consideration three candidates for the role of Claims Administrator as contemplated under the parties’ contemporaneously-filed Amended Stipulation of Settlement (the “Stipulation”): Simone Lechuk, Judge Diane Welsh (Ret.), and Judge Daniel Weinstein.¹

As the Court is aware, in their May 26, 2023 preliminary settlement approval filing, the parties proposed to designate Ms. Lechuk as Claims Administrator. Ms. Lechuk helped to facilitate a resolution of this Action as a mediator and has substantial prior experience handling claims of abuse by Jeffrey Epstein, as detailed in the enclosed curriculum vitae and related materials that Ms. Lechuk provided to the parties to submit to the Court. *See* Ex. A. The parties also worked collaboratively to identify Judge Welsh and Judge Weinstein, two additional distinguished candidates, for the Court’s consideration. Their experience and credentials are detailed in their enclosed materials. *See* Ex. B (Judge Walsh); Ex. C (Judge Weinstein).

While neither the parties nor the candidates are able to estimate the total cost of administering the Global Settlement Fund because, among other reasons, it is not yet known how many potential Class Members will apply to each settlement tier and thus how much time will be

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

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required to review claim submissions and conduct any required interviews with applicants, the candidates have each provided proposed fee structures for (i) the review and evaluation of Tier One submissions, (ii) the review and evaluation of Tier Two submissions, and (iii) general fund administration.

	Ms. Lelchuk	Judge Welsh	Judge Weinstein
Tier One Review	\$750 per hour	\$1,500 per hour	\$1,400 per hour
Tier Two Review	\$2,500 per claim	\$3,000 per claim	\$5,000 per claim
Fund Administration	\$750 per hour	\$1,500 per hour	\$1,400 per hour

As with any settlement fund of this type, the parties also expect that whichever person is appointed as claims administrator will need to engage third-party service providers to perform ministerial and related functions (*e.g.*, a claims and noticing agent, a disbursing agent, a medical lien resolution service, tax preparation). The parties will work with the selected claims administrator to identify the most cost-effective third-party service providers to perform these functions.

The parties are confident that each of the three candidates being proposed for the Court's consideration is well-suited for the Claims Administrator role. We are available at the Court's convenience to address any further questions.

Sincerely,

EDWARDS HENDERSON LEHRMAN

/s/ Bradley J. Edwards

BRADLEY J. EDWARDS

Bradley J. Edwards
Edwards Henderson Lehrman
425 N. Andrews Ave., Suite 2
Fort Lauderdale, FL 33301
Telephone : (954) 524-2820
Fax : (954) 524-2822
Email: brad@epllc.com

Counsel for Jane Doe 1

ROPES & GRAY LLP

/s/ David B. Hennes

DAVID B. HENNES

David B. Hennes
Ropes & Gray LLP

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1211 Avenue of the Americas
New York, NY 10036
Telephone: (212) 596-9000
Email: david.hennes@ropesgray.com

Counsel for Deutsche Bank

Enclosures